

United States District Court
for the
Eastern District of Michigan

U.S.A. vs. **Patricia Flannery**

Docket No. 19-cr-20652-04

Petition for Action on Conditions of Pretrial Release

COMES NOW Tacarra Lanzon, PRETRIAL SERVICES OFFICER presenting an official report upon the conduct of defendant Patricia Flannery, who was placed under pretrial release supervision by United States Magistrate Judge R. Steven Whalen sitting in the court at Eastern District of Michigan, on October 3, 2019, under the following conditions:

1. Report to Pretrial Services as directed.
2. Surrender any passport to Pretrial Services by 4pm on October 4, 2019.
3. Not obtain a passport or other international travel documents.
4. Travel restricted to the continental United States.
5. Avoid all contact, directly or indirectly, with any person who is or may become a victim or witness in the investigation or prosecution, and co-defendants unless in the presence of counsel.
6. Not use alcohol at all.
7. Not use or unlawfully possess a narcotic drug or other controlled substance defined in 21 U.S.C. 802, unless prescribed by a licensed medical practitioner.
8. Submit to drug testing as directed.
9. Submit to drug treatment as directed.
10. Do not bill or cause to be billed, any federal healthcare programs.

Respectfully presenting petition for action of court and for cause as follows:

At the time of the defendant's release on bond, it was noted she consumed marijuana one time approximately one year prior to being released on bond and that she consumed alcohol weekly, consuming approximately two drinks per occasion and primarily on the weekends. It was also noted the defendant self-reported an arrest some time in 2005 for Driving While Intoxicated for which she paid an undisclosed fine and had a suspended license for seven months. This arrest did not generate on the defendant's criminal history record.

Since being released on bond the defendant has been supervised by the United States Pretrial Services Agency in the Eastern District of Pennsylvania. According to the supervising Pretrial Services Officer in that district, the defendant has reported monthly as directed and has been subject to regular monthly drug testing and random alcohol testing. To date, the defendant has been in compliance with her bond conditions and all drug and alcohol tests have returned negative for any illegal or controlled substances.

Given the defendant's compliance with her bond conditions, consistent negative drug and alcohol tests, and minimal substance abuse history, Pretrial Services is recommending the defendant's bond be amended to remove the condition that she not consume alcohol at all as well as the condition that she participate in drug testing as directed. The defendant has demonstrated alcohol and drug use is no longer a risk factor while on supervision and therefore the conditions imposed to monitor and mitigate these risks are no longer needed.

Assistant United States Attorney, John McCormack and Mario H. Nguyen, Jr. as well as defense

counsel, Mark J. Kriger and N.C. Deday LeRene have been advised of this request.

**PRAYING THE COURT WILL ORDER THE REMOVAL OF THE BOND CONDITIONS
THAT THE DEFENDANT NOT CONSUME ALCOHOL AT ALL AND THE CONDITION
THAT SHE PARTICIPATE IN DRUG TESTING AS DIRECTED.**

ORDER OF COURT

Considered and ordered this 22nd day of September, 2021 and ordered filed and made a part of the records in the above case.

s/ David M. Lawson

David M. Lawson

United States District Court Judge

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 22, 2021

/s/ Tacarra Lanzon

U.S. Pretrial Services Officer

Place: Detroit, Michigan

Date: September 22, 2021